

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JAN 09 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
JONATHAN COWDEN,)
)
Defendant.)

4 : 13CR00007 AGF

INDICTMENT

COUNT ONE

The Grand Jury charges that:

At all times relevant:

1. Jonathan Cowden ("COWDEN"), the defendant herein, lived in the St. Louis area, within the Eastern District of Missouri.
2. COWDEN worked in the area of computer and information technology for a business in the Eastern District of Missouri.
3. COWDEN maintained accounts and access to social networking and information sharing Internet sites, including Twitter.com ("Twitter") and Pastebin.com ("Pastebin"). Twitter is sometimes referred to as a "microblogging" site that allows users to send messages of 140 characters or less, which are commonly referred to as "tweets." Pastebin allows users to upload and store text.
4. COWDEN maintained, used, and controlled Twitter accounts having the user/account names of "joncowden", and "_AnonymouSTL_". COWDEN maintained, used, and

controlled a Pastebin account having the user/account name of "Jonnyfive". COWDEN also used other names and aliases online, including "jonnyf5v3".

5. Structured Query Language, which is more commonly known as "SQL," is a programming language designed for use in managing databases, including databases that can be accessed via an Internet website.

6. Websites that use SQL are sometimes vulnerable to so called "SQL injection" attacks. A SQL injection attack can occur when an attacker inputs SQL statements into a web form that exploits a vulnerability that allows, for example, the attacker to perform operations on data and gain access to data that the attacker is not authorized to access. "Havij" is a tool that can be used to identify and exploit SQL vulnerabilities.

7. NBN.org.il ("NBN") is an Israeli-based business, also referred to as Nefesh B'Nefsh, that provides, among other things, services relating to assisting immigration to Israel. NBN maintains a server in Massachusetts that includes a calendaring database. The NBN server was a protected computer that was used in interstate and foreign commerce.

8. An Internet Protocol ("IP") address is a number that identifies a device on the Internet. An IP address is a series of four numbers, each in the range of 0-255, separated by periods.

9. Between in or around November 2011, and continuing until on or about January 17, 2012, in the Eastern District of Missouri and elsewhere,

JONATHAN COWDEN,

the defendant herein, attacked databases, including using SQL injection attacks, stole data and caused damage to protected computers.

10. Between in or around November 2011 and on or about January 9, 2012, COWDEN used his Twitter and Pastebin accounts to boast about his computer attack activity and to post information taken from websites he had attacked.

11. As part of his computer attacking activities, on or about January 6, 2012, COWDEN used Havij to exploit a vulnerability in the calendaring database of NBN. COWDEN's unauthorized access caused more than \$5,000 in loss to NBN.

12. On or about January 6, 2012, in the Eastern District of Missouri and elsewhere, JONATHAN COWDEN, the defendant herein, intentionally accessed a protected computer without authorization, and as a result of such conduct recklessly caused damage, and the offense caused a loss during a one-year period from the defendant's course of conduct affecting a protected computer system aggregating at least \$5,000 in value.

In violation of Title 18, United States Code, Sections 1030(a)(5)(B) and (c)(4)(A).

A TRUE BILL.

FOREPERSON

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